

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MONIQUE BROSCIOUS,)	
Plaintiff,)	
)	
)	CIVIL ACTION FILE
)	NO. 1:17-cv-1688-LMM
v.)	
)	
K&C ENTERPRISE GROUP LLC,)	
<i>doing business as 656 Sports Bar & Grill,</i>)	
Defendant.)	

AFFIDAVIT OF MARVIN S. ARRINGTON, JR., ESQ.

Before me, the undersigned authority did personally appear Marvin S. Arrington, Jr., who being duly sworn, stated and deposed under oath the following declaration:

Marvin S. Arrington, Jr. being duly sworn says that he is the attorney for the above-named defendant; that judgment by default was entered in this action in favor of plaintiff and against this defendant for the sum of \$80,491.76, damages and costs on November 27, 2017.

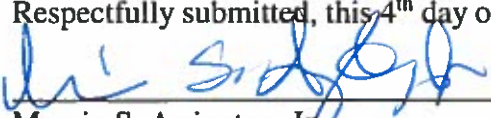
Defendant has a complete defense to the action and intended to interpose the defense, but defendant was not properly served with the lawsuit, defendant did not receive notice of the Default Hearing, Defendant paid Plaintiff hourly wages and overtime and has attached detailed timekeeping and pay records to its answer for the Plaintiff, that Plaintiff committed fraud by stating that she was not paid hourly wages and overtime, and that Plaintiff told Defendant that she dismissed the lawsuit.

The defendant first learned that judgment had been rendered against them on November 27, 2017 and immediately consulted and retained me as their attorney to take proceedings to have the default judgment set aside and to make the defense.

Defendant has fully and fairly stated their defense to defendant's attorney, and I advised defendant that it has a valid and substantial defense upon the merits. This defense is fully set forth in the answer to the complaint, a copy of which is attached as Exhibit A, and which defendant prays leave to serve and file.

Further Affiant Says Not

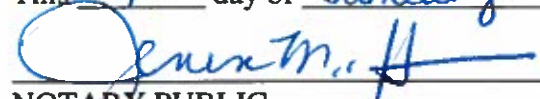
Respectfully submitted, this 4th day of January, 2018.



Marvin S. Arrington, Jr.

Sworn to and subscribed before me

This 4th day of January, 2018.



NOTARY PUBLIC

My Commission Expires:

November 4, 2018

Jenese M Hill
NOTARY PUBLIC
Douglas County, GEORGIA
My Comm. Expires
11/06/2018